

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Applicants:	U. Manber et al.	Attorney Docket No.:	121189
Application No.:	10/669,088	Art Unit:	2167 / Confirmation No: 1874
Filed:	September 23, 2003	Examiner:	M. Le
Title:	PERSONALIZED SEARCHABLE LIBRARY WITH HIGHLIGHTING CAPABILITIES		

PRE-APPEAL BRIEF REQUEST FOR REVIEW

Seattle, Washington 98101

April 14, 2008

TO THE COMMISSIONER FOR PATENTS:

Concurrent with filing a Notice of Appeal, applicants request a Pre-Appeal Brief Conference review of the claim rejections set forth in the above-identified patent application. No amendments are submitted with this request. Claims 1-13, 15-33, and 35-47 are pending. Claims 1, 24, and 33 are the independent claims.

For purposes of expediting review in the pre-appeal brief conference, applicants have directed their remarks herein solely to the independent claims, though applicants believe there is significant basis for separate patentability of the dependent claims. The final Office Action mailed November 14, 2007, rejected Claims 1, 24, and 33 as being unpatentable over Hartman (US 7,007,034) in view of Turner (US 6,633,742) and Blumberg (US 2004/0205546). The claim rejections are in clear error, however, for at least the reason that the claims each recite elements that are *missing from the cited references*. The differences are not merely matters of interpretation.

For convenience of review, independent Claims 1, 24, and 33 are repeated as follows:

Claim 1. A method for electronically searching a user-personalized library of content, comprising:

- (a) receiving one or more search terms from a user having an electronically-searchable personalized library of content, the personalized library including a text searchable database and a page image database;
- (b) electronically searching the text searchable database for pages of content that match the search terms to produce search results;
- (c) providing the search results to the user;
- (d) receiving a search result selection from the user; and
- (e) providing to the user an image of a page of content in the page image database based on the user's search result selection, wherein

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prior to providing the image of the page of content to the user, the appearance of the image is modified to automatically suppress content in a portion of the image in accordance with one or more access rules to limit the amount of content in the image, such that when the image is displayed, the portion of the image whose content is automatically suppressed appears to the user without the content and the portion of the image whose content is not suppressed is viewable.

Claim 24. A method for preparing a user-personalized library of content for electronic searching and delivery of content to a user, comprising:

- (a) acquiring a general library of content that includes images and corresponding text of pages of content;
- (b) preparing a page image database comprised of the images of pages of content;
- (c) preparing a text searchable database comprised of the corresponding text of pages of content;
- (d) receiving from a user a selection of content in the general library to form a user-personalized library of content that the user can electronically search using the text searchable database;
- (e) identifying an image of a page of content in the page image database based on a search of the text searchable database; and
- (f) modifying the appearance of the image to automatically suppress content in a portion of the image in accordance with one or more access rules to limit the amount of content in the image, such that when the image is displayed, the portion of the image whose content is automatically suppressed appears to the user without the content and the portion of the image whose content is not suppressed is viewable.

Claim 33. A computer system that provides electronic searching of a user-personalized library of content, comprising a search server in communication with a database server, in which the database server is configured with a general library of content that is accessible to multiple users, the general library including (1) a page image database containing images of pages of content, (2) an access rights database containing access rules that define the scope of content to be displayed to each user, and (3) a text searchable database containing text and identifying information indicating the page images in the page image database that contain the text, the search server being configured with a search engine comprised of computer-implemented instructions that enable the search server to:

- (a) receive one or more search terms from a user having established a personalized library within the general library of content,
- (b) search the full text of the user's personalized library for pages of content that match the search terms,

(c) provide the results of the full text search to the user for selection by the user, and

(d) provide to the user a page image from the page image database based on the user's search result selection, the content in the page image being provided within the scope defined by the access rules, wherein the scope defined by the access rules defines an amount of content in the page image that is viewable by the user such that when the page image is displayed, a portion of the page image appears with automatically suppressed content and a portion of the page image appears with content.

Claim 1 Is Patentable Over Hartman, Turner, and Blumberg

The Office Action acknowledged that Hartman fails to teach the elements of Claim 1, "wherein prior to providing the image of the page of content to the user, the appearance of the image is modified to suppress content in a portion of the image in accordance with one or more access rules to limit the amount of content in the image, such that when the image is displayed, the portion of the image whose content is suppressed appears to the user without the content and the portion of the image whose content is not suppressed is viewable." However, Turner and Blumberg also fail to disclose, teach, or suggest these elements.

Turner teaches a process for interactive, dynamic assembly of information. The information is selected and assembled from knowledge objects 104 or modules 122 that have submodules 120 and knowledge elements 128. See, e.g., Col. 23, lines 24-38, of Turner. If the information to be assembled includes elements that are redundant, the redundant submodules or knowledge elements may be removed or suppressed so that the information in the compilation is presented only once. See, e.g., Col. 24, lines 33-42, and Col. 30, lines 6-15. For example, a knowledge object 104 may contain two versions of the same content, one in English and one in French. Program code reads the current language setting and suppresses the knowledge element containing the content in the unselected language so that only one version of the content appears in the final compilation. However, it must be recognized that *Turner's process of removing or suppressing redundant information occurs before the various modules of information are assembled*. See Col. 25, lines 58-65. Hence, Turner is concerned with selecting information to assemble and include in a compiled end product. In contrast, the present application is concerned with taking an existing image and then modifying the image to produce an image that, when displayed, a portion of the image appears to the user without content and a portion of the image is viewable.

According to Claim 1, an image from a page image database is provided to a user based on a search result selection of the user. Prior to providing the retrieved image to the user, the appearance of the image is modified to automatically suppress content in a portion of the image.

When the image is displayed, the portion of the image whose content is suppressed appears to the user without the content and the portion of the image whose content is not suppressed is viewable. See, e.g., FIGURE 6 of the present application. Turner's process for excluding redundant information before compilation of the information is not equivalent to taking an existing image and modifying the appearance of the image so that when the image is displayed, a portion of the image appears to a user without content (e.g., as a blank area devoid of content) and another portion of the image is viewable. Turner does not teach this; instead, Turner completely removes the suppressed knowledge element prior to compiling the end product so that the suppressed knowledge element never appears to the user.

Blumberg also fails to teach the above-noted elements that are missing from Hartman and Turner. Blumberg displays "portions of images" only as users *zoom* in to look at specific portions of the images. See paragraph [0111]. Blumberg does not take an image from a database and then modify the appearance of the image to automatically suppress content in the image such that, when the image is displayed, the portion of the image whose content is automatically suppressed appears to the user without the content and the portion of the image whose content is not suppressed is viewable, as claimed in Claim 1.

Examples of an image having a modified appearance in accordance with Claim 1 are provided in the present application at FIGURE 6 (where, as compared to the image in FIGURE 4, the picture has been suppressed and the text in the image is viewable) and at FIGURE 11 (where an image of "Page 17" is shown with only certain text being viewable while the remaining portion of the page appears blank). Further reference may be made to the description in the present application at page 18, line 24, to page 19, line 14.

As an additional reason for patentability, applicants further note that Hartman, Turner, and Blumberg fail to teach the elements of "(a) receiving one or more search terms from a user having an electronically-searchable personalized library of content, the personalized library including a text searchable database and a page image database" and "(b) electronically searching the text searchable database for pages of content that match the search terms to produce search results." In Hartman, it is a central library server 44 that is searched. Nowhere does Hartman suggest a "user having an electronically-searchable personalized library of content" that includes a "text searchable database" that can be electronically searched "for pages of content that match the search terms."

The "client cache" disclosed by Hartman includes copies of objects for faster retrieval, but this cache is not searched based on terms received from a user. Applicants have studied the disclosures of Turner and Blumberg and do not find any teachings that overcome this deficiency

of disclosure in Hartman. Accordingly, for at least this additional reason, the rejection of Claim 1 should be withdrawn.

Claim 24 Is Patentable Over Hartman, Turner, and Blumberg

The Office Action conceded that Hartman does not fairly teach the elements of subpart (f) of Claim 24. Applicants further contend that Hartman fails to teach the elements of subpart (e), and that Turner and Blumberg fail to overcome the deficiencies of Hartman.

Applicants submit that Turner and Blumberg do not take an image from a database and then modify the appearance of the image to automatically suppress content in the image such that, when displayed, a portion of the image whose content is automatically suppressed appears to the user without the content and a portion of the image whose content is not suppressed is viewable, as claimed in Claim 24. For at least these reasons and reasons similar to those discussed herein with respect to Claim 1, the rejection of Claim 24 should be withdrawn.

Claim 33 Is Patentable Over Hartman, Turner, and Blumberg

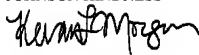
The Office Action confirmed that Hartman does not specifically teach the elements of subpart (d) of Claim 33. For similar reasons to those discussed above with respect to Claims 1 and 24, reliance on Turner and Blumberg as overcoming the deficiencies of Hartman is misplaced. Applicants further note that Hartman, Turner, and Blumberg fail to teach a search server configured with a search engine to act according to subparts (a) and (b), as claimed. For at least these additional reasons, the rejection of Claim 33 should be withdrawn.

CONCLUSION

Applicants respectfully submit that Hartman, Turner, and Blumberg do not support a *prima facie* rejection of the pending claims. The dependent claims are also allowable for at least the same reasons that Claims 1, 24, and 33 are allowable. Withdrawal of the claim rejections and allowance of the application is requested.

Respectfully submitted,

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